

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA**

PARAGON COMPONENT)	
SYSTEMS, LLC,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 1:24-cv-00246-CEA-CHS
)	
QUALTIM, INC., CENTER FOR)	
BUILDING INNOVATION, LLC,)	
DRJ ENGINEERING, LLC,)	
INSPIRED PURSUITS, LLC,)	
KIRK GRUNDAHL, and)	
SUZANNE GRUNDAHL,)	
)	
Defendants.)	

**PLAINTIFF PARAGON COMPONENT SYSTEMS, LLC'S SECOND SET OF
INTERROGATORIES TO DEFENDANTS**

Under Federal Rule of Civil Procedure 26 and 33, Plaintiff Paragon Component Systems, LLC provides its Second Interrogatories to Defendants.

Instructions

Defendants must respond to these interrogatories in compliance with the Federal Rules of Civil Procedure, applicable local rules of court and scheduling orders, and all other applicable rules and laws. Defendants must provide written answers to these interrogatories within 30 days of service. These interrogatories are continuing in nature. Defendants are required to supplement their responses pursuant to Federal Rule of Civil Procedure Rule 26(e)(1).

Definitions

“Defendants” or “You” means, collectively, Kirk Grundahl and Suzanne Grundahl individually and each of Qualtim, Inc., Center for Building Innovation, LLC, DrJ Engineering, LLC, and Inspired Pursuits, LLC and all parents, subsidiaries, affiliates, and related companies to

any of the foregoing and all owners, employees, members, directors, officers, agents, contractors, consultants, and representatives of any of the foregoing, and any other entities that may be later named as defendants in the present litigation. Each of the Defendants individually may be referenced herein as a Defendant.

“Paragon” or “Plaintiff” means Paragon Component Systems, LLC.

“Paragon Truss Software” means all software, including all computer programs, computer applications, source code, object code, application programming interfaces, software architecture, functionality, design, and user interfaces, and all software versions of each of the foregoing, and all user and developer documentation describing any of the foregoing, that are (1) used in or made available to customers through www.paragontruss.com or www.trusspal.com or (2) authored in part or in whole by Paragon or its employees, agents, consultants, contractors, members, or officers or (3) owned by Paragon (not including any software owned by third persons that is licensed by Paragon, such as Microsoft Office software).

“Paragon Truss Marks” means all trademarks, service marks, and trade dress that are used in commerce as a source identifier of Paragon to sell, offer for sale, promote, advertise, market, or distribute the Paragon Truss Software or any portion thereof, including without limitation software names, logos, non-functional looks and feels of user interfaces, screen displays, and distinctive colors and designs as well as the wordmarks “Paragon Truss” and “Truss Pal” and any associated design marks.

“Identify” with respect to an individual means stating the individual’s name, home or primary address, telephone number, and current employer if known, and for a business entity, the full company name and its primary address.

Interrogatories

7. Identify all individuals and business entities to whom any Defendant, or any agent of any Defendant, sent one or more of the emails contained in Documents 53-2, 53-3, and 53-4 filed in this action.

Respectfully submitted December 13, 2024

MILLER & MARTIN PLLC

s/ Robert F. Parsley

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*Counsel for Plaintiff Paragon Component
Systems, LLC*

CERTIFICATE OF SERVICE

I certify that on December 13, 2024 a copy of the foregoing **Plaintiff's Second Set of Requests for Interrogatories to Defendants** is being served on all counsel of record via email.

MILLER & MARTIN PLLC

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